

1 TOMAS E. MARGAIN (SBN 193555)  
2 [Tomas@JAWLawGroup.com](mailto:Tomas@JAWLawGroup.com)  
3 HUY TRAN (SBN 288196)  
4 [Huy@JAWLawGroup.com](mailto:Huy@JAWLawGroup.com)  
5 PHUNG H. TRUONG (SBN 287687)  
6 [Phung@JAWLawGroup.com](mailto:Phung@JAWLawGroup.com)  
7 JUSTICE AT WORK LAW GROUP  
8 84 West Santa Clara Street, Suite 790  
9 San Jose, CA 95113  
10 Telephone: (408) 317-1100  
11 Facsimile: (408) 351-0105

12 Attorneys for Plaintiffs  
13 MERCED TORRES and SIMON ZUNIGA

14 KRISTIN L. OLIVEIRA (SBN 204384)  
15 [koliveira@hkemploymentlaw.com](mailto:koliveira@hkemploymentlaw.com)  
16 HIRSCHFELD KRAEMER LLP  
17 505 Montgomery Street, 13th Floor  
18 San Francisco, CA 94111  
19 Telephone: (415) 835-9000  
20 Facsimile: (415) 834-0443

21 Attorneys for Defendants  
22 DGA SERVICES, INC. dba JIT  
23 TRANSPORTATION and  
24 BARRETT BUSINESS SERVICES, INC.

25 UNITED STATES DISTRICT COURT

26 NORTHERN DISTRICT

27 MERCED TORRES and SIMON  
28 ZUNIGA,

Plaintiff,  
vs.

DGA SERVICES, INC. dba JIT  
TRANSPORTATION; BARRETT  
BUSINESS SERVICES, INC.,

Defendants.

Case No. C 13-05734 JST

**JOINT STIPULATION EXTENDING  
DEFENDANTS DGA SERVICES, INC. dba  
JIT TRANSPORTATION AND BARRETT  
BUSINESS SERVICES, INC.'S TIME TO  
RESPOND TO PLAINTIFFS'  
COMPLAINT**

**Complaint Filed:** December 11, 2013

Plaintiffs Merced Torres and Simon Zuniga ("Plaintiffs") and Defendants DGA Services, Inc. dba JIT Transportation; Barrett Business Services, Inc. ("Defendants") (collectively "the

1 Parties”), by and through their respective counsel of record, pursuant to Local Rules 6-1 and 6-2,  
2 hereby stipulate and agree that:

3 WHEREAS, counsel for Defendants was only recently engaged in this matter to represent  
4 both named Defendants, DGA SERVICES, INC. dba JIT TRANSPORTATION and BARRETT  
5 BUSINESS SERVICES, INC., and entered an appearance on behalf of both Defendants on  
6 February 28, 2014;

7 WHEREAS, Defendant DGA SERVICES, INC. dba JIT TRANSPORTATION’s  
8 response to the Complaint was originally due February 19, 2014;

9 WHEREAS, Defendant BARRETT BUSINESS SERVICES, INC.’s response to the  
10 Complaint is currently due on March 6, 2014 per the Parties earlier stipulation (Document 11);

11 WHEREAS, Defendants believe it is efficient and cost-effective to file a joint response to  
12 the Complaint on behalf of both named Defendants; and,

13 WHEREAS, Plaintiffs recently filed a Motion to Continue the Initial Case Management  
14 Conference, presently set for March 12, 2014, to May 14, 2014, and to continue related ADR and  
15 meet and confer deadlines in accordance with a new date for the initial case management  
16 conference (Document 12), which awaits the Court’s ruling.

17 IT IS HEREBY STIPULATED by and between the Parties that Defendants DGA  
18 SERVICES, INC. dba JIT TRANSPORTATION and BARRETT BUSINESS SERVICES, INC.  
19 shall have until March 18, 2014 to answer or otherwise respond to Plaintiffs’ Complaint.

20 IT IS SO STIPULATED.

22 Dated: February 28, 2014

JUSTICE AT WORK LAW GROUP

24 By: /s/ Phung H. Truong

25 Tomas Margain  
26 Huy Tran  
27 Phung H. Truong  
28 Attorneys for Plaintiffs  
MERCED TORRES and SIMON ZUNIGA

1 Dated: February 28, 2014

HIRSCHFELD KRAEMER LLP

3 By: /s/ Kristin L. Oliveira

4 Kristin L. Oliveira

5 Attorneys for Defendants  
DGA SERVICES, INC. dba JIT  
TRANSPORTATION and  
6 BARRETT BUSINESS SERVICES, INC.

7 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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10 Dated: March 4, 2014

11 By:

12 HON.  
UNITED STATES DISTRICT COURT

JUDGE



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HIRSCHFELD KRAEMER LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO